



*Consulting Engineers
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February 11, 2011
(PBW Project No. 1649)

VIA FEDERAL EXPRESS

Mr. Gary Miller
Superfund Division, Region 6 (6SF-RA)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: January 2011 Monthly Report for UAO and January 2011 Monthly Report for Settlement Agreement, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Engblom:

Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) and Section VIII, Paragraph 41.a of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement) for the above-referenced Site. Parker Drilling Company has recently begun participating in the Site work as well under an agreement it reached with the above Respondents. As discussed in my telephone conversation with Mr. Miller on August 2, 2005, regarding the UAO, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. The Settlement Agreement requires submittal of a progress report by the 15th of every month.

In accordance with the UAO requirements for the Remedial Investigation/Feasibility Study (RI/FS) this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including partial preparation of the Draft BERA Report to be submitted to EPA by February 7, 2011;

- Remedial Investigation Report activities (SOW Paragraph 39) detailed under Task 9 of the RI/FS Work Plan, including partial preparation of the Draft RI Report to be submitted to EPA by February 7, 2011; and
 - Feasibility Study activities (SOW Paragraph 44) detailed under Task 10 of the RI/FS Work Plan, including telephone discussions with Mr. Miller regarding EPA's preliminary comments on the Draft Remedial Alternatives Memorandum (RAM) submitted to EPA on December 17.
2. Results of RI/FS sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new analytical data were received during the previous month.
 3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of RI/FS work – The following actions are planned for the next two months:
 - Preparation and submittal of the Draft BERA Report;
 - Preparation and submittal of the Draft RI Report; and
 - Preparation and submittal of the Final RAM Report (pending receipt of EPA comments on the Draft RAM Report).
 4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 85% complete.

In accordance with the Settlement Agreement requirements, this report also addresses the topics listed below for the Removal Action:

1. Significant Removal Action developments during the preceding period, including actions performed and any problems encountered – The following actions were taken during the previous month:
 - Removal and off-site management of aboveground storage tank (AST) contents;
 - AST decontamination prior to demolition;
 - AST demolition and removal; and
 - AST containment area decontamination, including soil excavation, verification sample collection, and backfilling.
2. Removal Action analytical data received during the reporting period – Analytical reports were received from the laboratory for the following samples:
 - Accumulated water samples collected from the containment areas on December 30, 2010;
 - Verification soil samples collected from the containment areas on January 13, 2011; and
 - An accumulated water sample collected from the north containment area on January 18, 2011.

These reports are provided in electronic form on the enclosed DVD.

3. Removal Action developments anticipated during next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems – As described in my January 26, 2011 e-mail to Mr. Miller, all tank content removal, tank decontamination, tank demolition and containment area decontamination activities were performed by the January 27, 2011 deadline for completion of field activities as specified in the Removal Action Work Plan attached to the Settlement Agreement. However, as noted in that e-mail, due to a temporary suspension in operations at the Clean Harbors incinerator used for disposal of hazardous solids generated during the removal action, nine roll-off boxes of hazardous solids (primarily excavated soils from the north containment area) could not be shipped from the Site to the disposal facility until after that deadline. As a result, a 30-day extension (to February 26, 2011) was requested to allow loading of the roll-offs onto trucks for off-site shipment. This extension request was subsequently approved in a January 31, 2011 e-mail from Mr. Miller. An extension to the schedule for submittal of the Draft Tank Removal Report (February 26, 2011) was not requested, and the draft report will be submitted by that date.

Thank you for the opportunity to submit this monthly report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Ray Merrell – Sequa Corporation
Mr. John Eldridge – Haynes and Boone, LLP
Mr. Donnie Belote - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP